

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
NEWNAN DIVISION**

IN RE:	:	Chapter 11
	:	
FOURTH QUARTER PROPERTIES 86, LLC,	:	Case No. 15-10135-whd
	:	
Debtor.	:	
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	:	
FOURTH QUARTER PROPERTIES 86, LLC,	:	
	:	
Plaintiff,	:	
	:	Adversary Proceeding
v.	:	
	:	No. 16-01035
MLIC ASSET HOLDINGS, LLC AND MLIC CB HOLDINGS, LLC	:	
	:	
Defendants.	:	
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**MOTION FOR EXPEDITED HEARING ON DEBTOR’S COMPLAINT SEEKING
PRELIMINARY AND LIMITED INJUNCTION, MOTION FOR PERMISSION TO FILE
MOTION TO MODIFY PLAN, AND MOTION FOR RELIEF UNDER FRBP 9024**

COMES NOW Fourth Quarter Properties, LLC, Reorganized Debtor in the above-styled case (the “Debtor”) and files the above-captioned motion wherein Debtor requests an expedited hearing on Debtor’s Complaint Seeking Preliminary and Limited Injunction, Motion for Permission to File Motion to Modify Plan, and Motion for Relief under FRBP 9024 (Dkt. 1) (the “Complaint”). In support thereof, Debtor respectfully shows this Court as follows:

1.

Debtor requests an expedited hearing pursuant to FRBP 7065(a) on the Request for Injunction and the shortening of notice for such hearing. Debtor submits that substantial harm to

Debtor's creditors other than MLIC Asset Holdings, LLC and MLIC CB Holdings, LLC will result unless it is authorized to receive the relief requested and to do all other things for which permission is sought in the Request for Injunction. This harm is more specifically described in the Complaint.

2.

Along with this Motion, Debtor's undersigned counsel submits his *Certification Regarding a Request for Expedited Hearing and Shortening of Notice* attached hereto as Exhibit A and incorporated herein by this express reference thereto. Debtor has also submitted a proposed Order authorizing expedited hearing and shortening notice.

Respectfully submitted this 21st day of November, 2016.

STONE & BAXTER, LLP

By:

/s/ Thomas T. McClendon

Ward Stone, Jr.

Georgia Bar No. 684630

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Counsel for Debtor

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE:	:	
	:	
ROHRIG INVESTMENTS, LP, <i>et al.</i> ,	:	Chapter 11 Case No. 13-53483-BEM
	:	(Jointly-Administered)
Debtors.	:	
	:	

**CERTIFICATION REGARDING REQUEST FOR EXPEDITED HEARING AND
SHORTENING OF NOTICE**

1.

I hereby certify, as a member of the Bar of this Court, that I have carefully examined this matter and that there is a true necessity for an expedited hearing.

2.

I further certify that the necessity for this expedited hearing has not been caused by any lack of due diligence on my part, but has been brought about only by the circumstances of the case.

3.

I further certify that I have made a bona fide effort to resolve this matter without a hearing.

Respectfully submitted this 21st day of November, 2016.

STONE & BAXTER, LLP

By:

/s/ Thomas T. McClendon

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